



Mr. Sam Chummar
Remedial Project Manager
USEPA Region 5
Superfund Division
Remedial Response Section #1
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604

Subject:

Kalamazoo Mill and former Hawthorne Mill Time Critical Removal Action Quarterly
Site Control Inspection Report #3

Dear Mr. Chummar:

Attached is the third quarterly post-removal site control inspection report for the Time Critical Removal Action at the Georgia-Pacific Corporation Kalamazoo Mill Property and the former Hawthorne Mill Property (collectively referred to as the Mill Properties) and the affiliated consolidation areas. The Mill Properties are associated with the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. This report has been prepared pursuant to the Administrative Settlement Agreement and Order on Consent, Docket No. V-W-'07-C-858 and covers activities from April 1, 2008 through June 30, 2008. For any questions regarding details of this letter, please feel free to contact me.

Sincerely,

ARCADIS

Patrick N. McGuire
Principal

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INDUSTRIAL

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July 29, 2008

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I. Actions Performed During Quarter

- A quarterly Post-Removal Inspection was conducted on May 14, 2008, which included field inspections of the Refuse Area, Oxbow Area (at the former Hawthorne Mill Property), and A-Site. The inspections were documented on the Post Removal Inspection Forms and in photographs taken during the inspection activities (Attachments 1 and 2, respectively) and are summarized below.
 - The documentation indicates that all of the inspected areas are adequately vegetated. There are no indications of bank erosion or rip rap instability at the Refuse Area.
 - The documentation indicates that the gates and fences around A-Site and the Refuse Area are currently in acceptable condition. In addition, the signs at the Refuse Area were documented as being maintained. There was a small area of soil disturbance from animal burrowing along the north fence in the Refuse Area, which was repaired during this reporting period.
 - Burrowing animal holes were observed within the Oxbow Area.
 - Site access roads are satisfactorily maintained for the A-Site. As shown in the photographic log in Attachment 2, the temporary cover system remains intact and shows no signs of erosion.
- Precipitation data from the Kalamazoo Airport was monitored at least once per week on the Weather Underground website (<http://www.wunderground.com/>). No 5-year, 24-hour (i.e., 3.4 inches/24 hours) rainfall events were observed during this reporting period. Data tables summarizing the daily precipitation measured at the Kalamazoo Airport are provided in Attachment 3.
- Although, no 5-year, 24-hour storm events occurred during this reporting period, a post-storm inspection was conducted on June 11, 2008 after a series of severe storms passed through Kalamazoo County. This

included field inspections of the Refuse Area, Oxbow Area (at the former Hawthorne Mill Property), and A-Site. The post-storm inspections were documented on Post Removal Inspection Forms and in photographs taken during the post-storm inspection activities (Attachments 1 and 2, respectively) and are summarized below.

- The documentation indicates that all of the inspected areas are adequately vegetated. There are no indications of bank erosion or rip rap instability at the Refuse Area. However, flooding over the rip-rap was observed.
 - The documentation indicates that the gates and fences around A-Site and the Refuse Area are currently in acceptable condition and no damage was caused as a result of the storm.
 - Site access roads are satisfactorily maintained for the A-Site. The temporary cover system remains intact and shows no signs of erosion or damage as a result of the storm.
- The Final Report was finalized and submitted to USEPA in April.

II. Schedule of Actions to be Performed

- The tentative date for the next quarterly site inspection is August 13, 2008.

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Attachment 1

Post-Removal Inspection Forms

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A-Site

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

A-Site

Inspection Date: 5-14-08

Weather Conditions:

Inspectors: Keith W. Schillo

RAINY 50°

Time Arrived: 10:00 (AM/PM)

Time Departed: 11:15 (AM/PM)

Inspection Items	Item Condition		Comments
	Satisfactory	Unsatisfactory	
A. Site Access Road			
• Erosion/Washout/Settlement	✓		
• Sufficient Gravel	✓		
B. Site Security			
• Access Gates	✓		
• Fence Integrity	✓		
• Signs	✓		
• Locks	✓		
C. A-Site Temporary Cover System			
• Bare Spots	✓		TWO AREAS NOT AS FULL OF GROWTH AS THE REST OF LANDFILL
• Stressed Vegetation	✓		
• Cracks	✓		
• Burrowing Animals	✓		
• Erosion	✓		
• Settlement	✓		
• Water Ponding	✓		
• Protruding Objects	✓		
• Undesirable Growth	✓		
• Slope Movement	✓		
D. Sheetpile Wall			

*Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form*

Inspected Items	Item Condition		Comments
	Satisfactory	Unsatisfactory	
• Erosion Subsidence or Cracking of Soils Behind Wall	✓		
• Wall Joints	✓		
• Overall Wall Stability	✓		
E. Refuse and Oxbow Areas Slope Protection System			
• Bank Erosion	✓		
• Rip Rap Revetment			NA
• Stressed Vegetation	✓		
• Bare Spots	✓		
I. Overall Site Appearance	✓		

Comments/Proposed Action Items:

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

A-Site

Inspection Date: 6-11-08

Weather Conditions:

Inspectors: Keith W. Schillo

SUNNY 72°

Time Arrived: 7:30 (AM/PM)

Time Departed: 8:45 (AM/PM)

Inspection Items	Inspected	Inspected	Inspected
A. Site Access Road			
• Erosion/Washout/Settlement	✓		
• Sufficient Gravel	✓		
B. Site Security			
• Access Gates	✓		
• Fence Integrity	✓		TWO POSTS bent, fence is
• Signs	✓		OKAY
• Locks	✓		
C. A-Site Temporary Cover System			
• Bare Spots	✓		
• Stressed Vegetation	✓		
• Cracks	✓		Very good growth
• Burrowing Animals	✓		
• Erosion	✓		
• Settlement	✓		
• Water Ponding	✓		
• Protruding Objects	✓		
• Undesirable Growth	✓		
• Slope Movement	✓		
D. Sheetpile Wall			

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Items	Item Condition		Comments
	Satisfactory	Unsatisfactory	
• Erosion Subsidence or Cracking of Soils Behind Wall	✓		
• Wall Joints	✓		
• Overall Wall Stability	✓		
E. Refuse and Oxbow Areas Slope Protection System			
• Bank Erosion	✓		
• Rip Rap Revetment			NA
• Stressed Vegetation	✓		
• Bare Spots	✓		
I. Overall Site Appearance	✓		looks good, heavy growth

Comments/Proposed Action Items:

POST RAIN INSPECTION

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Refuse Area

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Date: 5-14-08

Weather Conditions:

Inspectors: Keith W. Schiavo

RAINY 52°

Time Arrived: 1:15 (AM/PM)

Time Departed: 2:45 (AM/PM)

Inspection Items	Item Condition	Comments
A. Site Access Road		
• Erosion/Washout/Settlement	✓	
• Sufficient Gravel	✓	
B. Site Security		
• Access Gates	✓	
• Fence Integrity	✓	
• Signs	✓	
• Locks	✓	
C. A-Site Temporary Cover System		
• Bare Spots	✓	
• Stressed Vegetation	✓	
• Cracks	✓	
• Burrowing Animals	✓	
• Erosion	✓	
• Settlement	✓	
• Water Ponding	✓	
• Protruding Objects	✓	
• Undesirable Growth	✓	
• Slope Movement	✓	
D. Sheetpile Wall		

*Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form*

Inspection Items	Item Condition		Comments
	Satisfactory	Unsatisfactory	
• Erosion Subsidence or Cracking of Soils Behind Wall			NA
• Wall Joints			NA
• Overall Wall Stability			NA
E. Refuse and Oxbow Areas Slope Protection System			
• Bank Erosion			
• Rip Rap Revetment	✓		Several Areas have some Liner showing
• Stressed Vegetation	✓		
• Bare Spots	✓		New Grass growing in near river bank
I. Overall Site Appearance	✓		

Comments/Proposed Action Items:

one repair of soil made on north side

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Date: 6-11-08

Weather Conditions:

Inspectors: Keith W. Schillo

Sunny 78°

Time Arrived: 10:15 (AM/PM)

Time Departed: 11:15 (AM/PM)

Inspection Item	Inspected	Compliant	Notes
A. Site Access Road			
• Erosion/Washout/Settlement	✓		
• Sufficient Gravel	✓		
B. Site Security			
• Access Gates	✓		
• Fence Integrity	✓		
• Signs	✓		
• Locks	✓		
C. A-Site Temporary Cover System			
• Bare Spots	✓		
• Stressed Vegetation	✓		
• Cracks	✓		
• Burrowing Animals	✓		
• Erosion	✓		
• Settlement	✓		
• Water Ponding	✓		(Water on property due to river being so high & over the rip rap.)
• Protruding Objects	✓		
• Undesirable Growth	✓		
• Slope Movement	✓		
D. Sheetpile Wall			

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Items	Can Condition		Comments
	Satisfactory	Unsatisfactory	
• Erosion Subsidence or Cracking of Soils Behind Wall			NA
• Wall Joints			NA
• Overall Wall Stability			NA
E. Refuse and Oxbow Areas Slope Protection System			
• Bank Erosion	✓		
• Rip Rap Revetment	✓		SEVERAL AREAS HAVE SOME LINER SHOWING
• Stressed Vegetation	✓		
• Bare Spots	✓		
I. Overall Site Appearance	✓		LOT OF NEW GRASS GROWING

Comments/Proposed Action Items:

POST RAIN INSPECTION

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Oxbow Area

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Date: 5-14-08

Weather Conditions:

Inspectors: Keith W. Schillo

RAINY 50°

Time Arrived: 11:30 (AM/PM)

Time Departed: 12:30 (AM/PM)

Inspection Items	Item Condition		Comments
	Satisfactory	Dissatisfactory	
A. Site Access Road			
• Erosion/Washout/Settlement			NA
• Sufficient Gravel			NA
B. Site Security			
• Access Gates			NA
• Fence Integrity			NA
• Signs	✓		
• Locks			NA
C. A-Site Temporary Cover System			
• Bare Spots	✓		
• Stressed Vegetation	✓		
• Cracks	✓		
• Burrowing Animals	✓		1 mole from Burrowing Animal
• Erosion	✓		
• Settlement	✓		Settlement in two areas
• Water Ponding	✓		
• Protruding Objects	✓		
• Undesirable Growth	✓		
• Slope Movement	✓		
D. Sheetpile Wall			

*Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form*

Inspected Items	Item Condition		Comments
	Satisfactory	Unsatisfactory	
• Erosion Subsidence or Cracking of Soils Behind Wall			NA
• Wall Joints			NA
• Overall Wall Stability			NA
E. Refuse and Oxbow Areas Slope Protection System			
• Bank Erosion	✓		
• Rip Rap Revetment			NA
• Stressed Vegetation	✓		
• Bare Spots	✓		
I. Overall Site Appearance	✓		Looks good, good vegetation

Comments/Proposed Action Items:

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Date: 6-11-08

Weather Conditions:

Inspectors: Keith W. Schillo

SUNNY 75°

Time Arrived: 9:00 (AM/PM)

Time Departed: 10:00 (AM/PM)

Inspection Item	Inspected	Inspected	Inspected
A. Site Access Road			
• Erosion/Washout/Settlement			NA
• Sufficient Gravel			NA
B. Site Security			
• Access Gates			NA
• Fence Integrity			NA
• Signs	✓		
• Locks			NA
C. A-Site Temporary Cover System			
• Bare Spots	✓		
• Stressed Vegetation	✓		Very thick growth
• Cracks	✓		
• Burrowing Animals			2 holes from Burrowing ANIMALS
• Erosion	✓		
• Settlement	✓		
• Water Ponding	✓		
• Protruding Objects	✓		
• Undesirable Growth	✓		
• Slope Movement	✓		
D. Sheetpile Wall			

Georgia-Pacific Corporation
Time Critical Removal Action
Refuse Area at the Kalamazoo Property and
Oxbow Area at the Former Hawthorne Mill Property
Post-Removal Inspection Form

Inspection Items	Soil Condition		Comments
	Satisfactory	Unsatisfactory	
• Erosion Subsidence or Cracking of Soils Behind Wall			NA
• Wall Joints			NA
• Overall Wall Stability			NA
E. Refuse and Oxbow Areas Slope Protection System			
• Bank Erosion	✓		
• Rip Rap Revetment			NA
• Stressed Vegetation	✓		
• Bare Spots	✓		
I. Overall Site Appearance	✓		Very thick & tall growth Looks good

Comments/Proposed Action Items:
POST RAIN INSPECTION

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Attachment 2

Photographic Log

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A-Site

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

A-Site Photographic Log



May 2008- Fence from the gate facing east at A-Site



May 2008- Fence from the gate facing south at A-Site

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report
Attachment 2
A-Site Photographic Log



May 2008- Slope on the south side of A-Site



May 2008- Top of the slope on the north side of A-Site



June Post-Storm 2008- North side of A-Site facing west



June Post-Storm 2008- Fence facing south at A-Site

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report
Attachment 2
A-Site Photographic Log



June Post-Storm 2008- Main gate at A-Site



June Post-Storm 2008- North side of A-Site facing east

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Refuse Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



May 2008- River on the southwest side of Refuse Area



May 2008- East side of Refuse Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report
Attachment 2
Refuse Area Photographic Log



May 2008- Gates on the east side of Refuse Area



May 2008- Heading west from east side of Refuse Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



May 2008- Fence at Refuse Area facing south from the gate



May 2008- North side of fence at Refuse Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



May 2008- North fence line repair area (burrowing animal soil disturbance) at Refuse Area



May 2008- Rip rap at Refuse Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



May 2008- Southwest side of Refuse Area



May 2008- New growth on the southwest side of Refuse Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



June Post-Storm 2008- Refuse Area facing east



June Post-Storm 2008-Refuse Area facing north to trestle

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report
Attachment 2
Refuse Area Photographic Log



June Post-Storm 2008-Refuse Area facing north



June Post-Storm 2008- Refuse Area facing south

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



June Post-Storm 2008- Refuse Area facing west



June Post-Storm 2008- Main gate at Refuse Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



June Post-Storm 2008- North fence line repair area (burrowing animal soil disturbance at Refuse Area



June Post-Storm 2008- Rip-rap at Refuse Area facing west

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



June Post-Storm 2008- Refuse Area flooded west bank



June Post-Storm 2008- Refuse Area flooded west bank

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Refuse Area Photographic Log



June Post-Storm 2008- Refuse Area flooded west bank

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Oxbow Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Oxbow Area Photographic Log



May 2008- Animal hole at Oxbow Area



May 2008- East side of Oxbow Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Oxbow Area Photographic Log



May 2008- Southwest side of Oxbow Area



May 2008- Northwest side of Oxbow Area

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 2

Oxbow Area Photographic Log



June Post-Storm 2008- North side of Oxbow Area facing west



June Post-Storm 2008- North side of Oxbow Area facing east

Attachment 3

Precipitation Data Tables

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 3

Precipitation Data Table

Date	Precipitation Sum (in)
4/1/2008	0.02
4/2/2008	0.00
4/3/2008	0.03
4/4/2008	0.11
4/5/2008	0.00
4/6/2008	0.00
4/7/2008	0.00
4/8/2008	0.04
4/9/2008	0.23
4/10/2008	0.00
4/11/2008	0.00
4/12/2008	0.00
4/13/2008	0.02
4/14/2008	0.00
4/15/2008	0.00
4/16/2008	0.00
4/17/2008	0.00
4/18/2008	0.00
4/19/2008	0.00
4/20/2008	0.00
4/21/2008	0.00
4/22/2008	0.00
4/23/2008	0.00
4/24/2008	0.04
4/25/2008	0.00
4/26/2008	0.00
4/27/2008	0.00
4/28/2008	0.10
4/29/2008	0.00
4/30/2008	0.00

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 3

Precipitation Data Table

Date	Precipitation Sum (in)
5/1/2008	0.00
5/2/2008	0.43
5/3/2008	0.05
5/4/2008	0.00
5/5/2008	0.00
5/6/2008	0.00
5/7/2008	0.55
5/8/2008	0.00
5/9/2008	0.00
5/10/2008	0.00
5/11/2008	0.71
5/12/2008	0.00
5/13/2008	0.00
5/14/2008	0.19
5/15/2008	0.00
5/16/2008	0.00
5/17/2008	0.00
5/18/2008	0.00
5/19/2008	0.00
5/20/2008	0.00
5/21/2008	0.00
5/22/2008	0.00
5/23/2008	0.00
5/24/2008	0.00
5/25/2008	0.00
5/26/2008	0.09
5/27/2008	0.00
5/28/2008	0.00
5/29/2008	0.00
5/30/2008	0.05
5/31/2008	0.00

Georgia-Pacific Time Critical Removal Action Quarterly Site Inspection Report

Attachment 3

Precipitation Data Table

Date	Precipitation Sum (in)
6/1/2008	0.00
6/2/2008	0.00
6/3/2008	0.21
6/4/2008	0.04
6/5/2008	0.00
6/6/2008	0.34
6/7/2008	0.21
6/8/2008	0.97
6/9/2008	0.10
6/10/2008	0.09
6/11/2008	0.00
6/12/2008	0.00
6/13/2008	0.61
6/14/2008	0.01
6/15/2008	0.12
6/16/2008	0.00
6/17/2008	0.00
6/18/2008	0.00
6/19/2008	0.00
6/20/2008	0.00
6/21/2008	0.03
6/22/2008	0.00
6/23/2008	0.00
6/24/2008	0.00
6/25/2008	0.06
6/26/2008	0.00
6/27/2008	0.09
6/28/2008	0.20
6/29/2008	0.33
6/30/2008	0.00